

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

IOENGINE, LLC,

Plaintiff,

v.

PAYPAL HOLDINGS, INC.

Defendant.

Case No. 18-452 (WCB)

JOINT STIPULATION AND [PROPOSED] ORDER OF DISMISSAL

Pursuant to Fed. R. Civ. P. 41(a), plaintiff IOENGINE, LLC and defendant PayPal Holdings, Inc., parties to this legal action, by and through their attorneys, hereby stipulate, subject to the Court's approval, that:

1. All claims against defendant PayPal Holdings, Inc. are dismissed with prejudice;
2. All counterclaims against IOENGINE, LLC are dismissed without prejudice; and
3. Each party is to bear its own costs and attorneys' fees with respect to this legal action and the entry of this Stipulation and Order of Dismissal.

SMITH, KATZENSTEIN & JENKINS LLP

/s/ Daniel A. Taylor

Neal C. Belgam (# 2721)
Daniel A. Taylor (#6934)
1000 N. West Street, Suite 1501
Wilmington, DE 19801
(302) 652-8400
nbelgam@skjlaw.com
dtaylor@skjlaw.com

Attorneys for IOENGINE, LLC

OF COUNSEL:

Noah M. Leibowitz
Gregory T. Chuebon
DECHERT LLP
Three Bryant Park
1095 Avenue of the Americas
New York, NY 10036-6797
(212) 698-3500

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Brian P. Egan

Brian P. Egan (#6227)
1201 North Market Street
P.O. Box 1347
Wilmington, DE 19899
(302) 658-9200
began@morrisnichols.com

Attorneys for PayPal Holdings, Inc.

OF COUNSEL:

Jared Bobrow
Travis Jensen
Robert L. Uriarte
ORRICK, HERRINGTON & SUTCLIFFE LLP
1000 Marsh Road
Menlo Park, CA 94025-1015
(650) 614-7400

Alyssa M. Caridis
ORRICK, HERRINGTON & SUTCLIFFE LLP
777 South Figueroa Street, Suite 3200
Los Angeles, CA 90017
(213) 629-2020

October 10, 2025

SO ORDERED this ____ day of October, 2025.

Hon. William C. Bryson
United States Circuit Judge